

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input checked="" type="checkbox"/> Other:	5. DATE OF REQUEST: 10/18/2016	NEED RESPONSE BY: 11/1/2016
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Yolo	
3. PHONE NO.:	7. SUBJECT: Third Party Info/VUR	
4. REGULATION CITE(S):	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 12-25, ACL 16-43, ACL 15-95	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Regarding 3rd party information, not reported by client but information is a mandatory mid-period report. A New Hire Report alert states that the client starting working. The worker looks on The Work Number to verify income. The income on The Work Number shows that the client is over the 200% FPL. Since the client is required to report income that exceeds the household's IRT, can The Work Number be used as verified upon receipt to take action on the case? (For example, discontinue the case and/or process an overissuance for months in which the client exceeded IRT)

10. REQUESTOR'S PROPOSED ANSWER:

Per ACL 16-43, The CWDs are permitted to use information obtained from the Work Number in the same manner as they would use information provided by the employer and may not need to ask the participant for additional documentation. Additionally, CWDs may also use the WN for the CalFresh program. This service can be used for initial and ongoing eligibility along with fraud detection in either or both programs in conjunction with, and not in lieu of, existing required income and eligibility sources. The CWDs must obtain written authorization from applicants and recipients to use the WN to obtain this information.

Continued on page 2.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Information acquired from the Work Number is not considered VUR. Per instructions in ACL 13-17, Verified upon receipt means that the information provided is not questionable, the provider is the primary source of the information, and no further information is needed to take action. Types of information that would not be considered VUR include quarterly wage match data, new hire matches, unearned income matches from Internal Revenue Service, and wage data from the Social Security Administration. Data gathered from the work number would fall into this category.

FOR CDSS USE

DATE RECEIVED: 10/18/2016	DATE RESPONDED TO COUNTY/ALJ: 11/1/2016 RN
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CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)

1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		5. DATE OF REQUEST: 10/13/2016	NEED RESPONSE BY: 11/01/2016
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Yolo	
3. PHONE NO.:		7. SUBJECT: Third Party Info/VUR	
4. REGULATION CITE(S):		8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 12-25, ACL 16-43, ACL 15-95	

In general, at application or at redetermination for CalWORKs and/or CalFresh programs, authorization from applicants/recipients is provided by their signature on the SAWS 2 PLUS (4/15) - Application For CalFresh, Cash Aid, And/Or Medi-Cal/Health Care Programs. Specifically on page three, under Privacy Act and Disclosure, it states

"The County will check your answers using information in state and federal electronic databases and databases from the Internal Revenue Service (IRS), Social Security Administration, the Department of Homeland Security, and/or a consumer reporting agency."

Per ACL 15-95, When establishing a CalFresh IO, the OI amount is computed by determining the actual household circumstances, including changes the household failed to report. Since there is verification from the Work Number that income continued to go over IRT since 07/2016, an OP will need to be issued for 10/2016.